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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR No. 08-0514
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	EXCLUDING TIME UNDER 18 U.S.C. § 3161
v.)	
)	
LAURO ANTONIO VELASQUEZ-)	
SANCHEZ,)	
)	
Defendant.)	
)	

On August 14, 2008, the parties appeared before the Court for trial setting. At that time counsel for defendant informed the Court that the defendant would be entering a change of plea. The Court set August 21, 2008 for the continuance of the hearing for a change of plea of defendant. The Court agreed to exclude all time under the Speedy Trial Act between August 14, 2008 and August 21, 2008 for effective preparation of counsel. 18 U.S.C. § 3161(h)(8)(B)(iv). The parties agree that the ends of justice served by granting such a continuance to finalize a plea agreement for the defendant outweigh the best interests of the public and the defendant in a

1 speedy trial. 18 U.S.C. § 3161(h)(8)(A).

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3 SO STIPULATED:

4 JOSEPH P. RUSSONIELLO
5 United States Attorney

6
7 DATED: August 15, 2008

/s/

KATHERINE B. DOWLING
Assistant United States Attorney

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9
10 DATED: August 15, 2008

/s/

DANIEL BLANK
Attorney for Defendant

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13 Failure to grant an exclusion of time for the requested continuance would deny counsel for
14 defendant and the attorney for the government reasonable time necessary for effective
15 preparation. 18 U.S.C. § 3161(h)(8)(B)(iv). Therefore, the Court finds that exclusion of time
16 from August 14, 2008 through August 21, 2008, is warranted because the ends of justice served
17 by the exclusion of time outweigh the best interests of the public and the defendant in a speedy
18 trial. 18 U.S.C. § 3161(h)(8)(A).

19
20 SO ORDERED.

21
22 DATED: _____

23 THE HONORABLE JEFFREY S. WHITE
United States District Judge